

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 6:21-cv-00902

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AGAINST SAMSUNG ELECTRONICS CO., LTD AND
SAMSUNG ELECTRONICS AMERICA, INC.**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Scramoge Technology Limited (“Plaintiff” or “Scramoge”) makes the following allegations against Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”):

INTRODUCTION

1. This complaint arises from Samsung’s unlawful infringement of the following United States patents owned by Plaintiff, which relate to improvements in wireless charging of mobile devices: United States Patent Nos. 9,490,652 (“the ’652 Patent”), 10,199,876 (“the ’876 Patent”), and 10,193,392 (“the ’392 Patent”) (collectively, the “Asserted Patents”).

PARTIES

2. Plaintiff Scramoge Technology Limited is a limited liability company organized and existing under the law of Ireland, with its principal place of business at The Hyde Building, Suite 23, The Park, Carrickmines, Dublin 18, Ireland. Scramoge is the sole owner by assignment

of all right, title, and interest in the Asserted Patents, including the right to recover damages for past, present, and future infringement.

3. On information and belief, Defendant Samsung Electronics Co., Ltd. is a corporation organized under the laws of South Korea, with its principal place of business at 129 Samsung-ro, Maetan-dong, Yeongtong-gu, Suwon-si, Gyeonggi-do, 443-742, South Korea.

4. On information and belief, Defendant Samsung Electronics America, Inc., a wholly owned subsidiary of Samsung Electronics Co., Ltd., is a corporation organized under the laws of the State of New York, with its principal place of business at 85 Challenger Rd., Ridgefield Park, New Jersey 07660.

JURISDICTION AND VENUE

5. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Samsung in this action because Samsung has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Samsung would not offend traditional notions of fair play and substantial justice. Samsung, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patents.

7. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Defendant Samsung Electronics America, Inc. is registered to do business in Texas. Additionally, upon information and belief, Defendants have transacted business in this District and have committed

acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patents. Defendants have regular and established places of businesses in this District, including at 12100 Samsung Boulevard, Austin, Texas 78754; 7300 Ranch Road 2222, Austin, Texas 78730; and 1700 Scenic Loop, Round Rock, Texas 78681. *See* Exhibits 1-3. Additionally, venue is proper as to a foreign defendant in any district. 28 U.S.C. § 1391(c)(3); *In re HTC Corp.*, 889 F.3d 1349 (Fed. Cir. 2018). Defendant Samsung Electronics Co., Ltd. is a foreign corporation organized under the laws of Korea, with a principal place of business in Korea.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 9,490,652

8. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

9. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 9,490,652, entitled “Wireless charger equipped with auxiliary power supply and auxiliary power device.” The ’652 Patent was duly and legally issued by the United States Patent and Trademark Office on November 8, 2016. A true and correct copy of the ’652 Patent is attached as Exhibit 4.

10. On information and belief, Samsung makes, uses, offers for sale, sells, and/or imports certain products, including without limitation the Samsung Wireless Charger Portable Battery 10,000 mAh (EB-U1200) and 25W Wireless Portable Battery (EB-U3300) (“Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’652 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

11. The Accused Products satisfy all claim limitations of one or more claims of the '652 Patent. A claim chart comparing exemplary independent claim 1 of the '652 Patent to representative Accused Products is attached as Exhibit 5.

12. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Samsung has injured Plaintiff and is liable for infringement of the '652 Patent pursuant to 35 U.S.C. § 271.

13. As a result of Samsung's infringement of the '652 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for Samsung's infringement, but in no event less than a reasonable royalty for the use made of the invention by Samsung, together with interest and costs as fixed by the Court.

COUNT II

INFRINGEMENT OF U.S. PATENT NO. 10,199,876

14. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

15. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 10,199,876, entitled "Wireless power transmitter." The '876 Patent was duly and legally issued by the United States Patent and Trademark Office on February 5, 2019. A true and correct copy of the '876 Patent is attached as Exhibit 6.

16. On information and belief, Samsung makes, uses, offers for sale, sells, and/or imports certain products, including without limitation Samsung Wireless Charger (EP-NG930), Fast Charge Wireless Charging Pad (EP-PN920), Fast Charge Wireless Charging Convertible (EP-PG950), Fast Charge Wireless Charger Stand (EP-N5100), Wireless Charger Stand 9W (EP-

N5105), Wireless Charger Stand 15W (EP-N5200), and Duo Charger (EP-N6100) (“Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’876 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

17. The Accused Products satisfy all claim limitations of one or more claims of the ’876 Patent. A claim chart comparing exemplary independent claim 1 of the ’876 Patent to representative Accused Products is attached as Exhibit 7.

18. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Samsung has injured Plaintiff and is liable for infringement of the ’876 Patent pursuant to 35 U.S.C. § 271.

19. As a result of Samsung’s infringement of the ’876 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for Samsung’s infringement, but in no event less than a reasonable royalty for the use made of the invention by Samsung, together with interest and costs as fixed by the Court.

COUNT III

INFRINGEMENT OF U.S. PATENT NO. 10,193,392

20. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

21. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 10,193,392, entitled “Wireless power transfer device and wireless power transfer system.” The ’392 Patent was duly and legally issued by the United States Patent and Trademark Office on January 29, 2019. A true and correct copy of the ’392 Patent is attached as Exhibit 8.

22. On information and belief, Samsung makes, uses, offers for sale, sells, and/or imports certain products, including without limitation the Samsung Wireless Charger Stand (EP-NG930, EP-N5100, EP-N5105), Samsung Wireless Charger (EP-PA510, EP-PG920I, EP-PN920, EP-P3100, EP-P1100, EP-P1300), Wireless Charger Pad 9W (EP-P3105), Fast Charge Wireless Charging Convertible (EP-PG950), Wireless Charger Stand 15W (EP-N5200), Convertible Wireless Charging Stand (EP-N3300), Wireless Charging Duo Pad (EP-P5200), Wireless Charger Duo (EP-N6100), Wireless Charger Tray (EP-PA710), Wireless Charger Trio (EP-P6300), Wireless Charging Vehicle Dock (EP-HN910I), UV Sanitizer With Wireless Charging (GP-TOU020), and all Samsung Wireless Chargers and Charging Docks for the Galaxy Watch (including but not limited to any chargers sold with or as an accessory to the Galaxy Watch, Galaxy Watch 3, Galaxy Watch 4, Galaxy Watch Active, Galaxy Active 2, EP-OR825, and EP-Y0805) (“Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’392 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

23. The Accused Products satisfy all claim limitations of one or more claims of the ’392 Patent. A claim chart comparing exemplary independent claim 1 of the ’392 Patent to representative Accused Products is attached as Exhibit 9.

24. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Samsung has injured Plaintiff and is liable for infringement of the ’392 Patent pursuant to 35 U.S.C. § 271.

25. As a result of Samsung’s infringement of the ’392 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for Samsung’s

infringement, but in no event less than a reasonable royalty for the use made of the invention by Samsung, together with interest and costs as fixed by the Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that Samsung has infringed, either literally and/or under the doctrine of equivalents, the '652, '876, and '392 Patents;
- c. A judgment and order requiring Samsung to pay Plaintiff its damages (past, present, and future), costs, expenses, and pre-judgment and post-judgment interest for Samsung's infringement of the '652, '876, and '392 Patents;
- d. A judgment and order requiring Samsung to pay Plaintiff compulsory ongoing licensing fees, as determined by the Court in equity.
- e. A judgment and order requiring Samsung to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest and compensation for infringing products released after the filing of this case that are not colorably different from the accused products;
- f. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Samsung; and
- g. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: August 30, 2021

Respectfully submitted,

/s Reza Mirzaie

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